

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

In re:

BLENKO GLASS COMPANY

Case No. 3:11-bk-30332

Chapter 11

Debtor.

**OBJECTION OF THE BIG TWO MILE GAS COMPANY
TO THE PROPOSED DISCLOSURE STATEMENT AND CHAPTER 11 PLAN**

Now comes Big Two Mile Gas Company ("Big Two Mile"), a party in interest, by and through its undersigned counsel, and makes its objection to the Disclosure Statement and Chapter 11 Plan as follows:

1. Big Two Mile incorporates by reference the objections of the Unsecured Creditor's Committee to the Disclosure Statement and Chapter 11 Plan.

2. Big Two Mile has a lien on certain of the real and personal assets of the Debtor. At sometime prior to the filing of this Petition Don and Walter Blenko (the "Blenkos") loaned to the Debtor certain sums and took a lien on personal property of the Debtor to secure that indebtedness. At that time, Big Two Mile subordinated its lien position to that of the Blenkos' to the extent of \$200,000. The Blenkos admittedly allowed their lien to expire. The Plan essentially proposes to "cram down" Big Two Mile's lien position to the extent of that \$200,000 and give to the Debtor the benefit of the Blenkos' failure to continue the perfection of its lien. The Disclosure statement does not adequately address or support the basis and validity of such a "cram down."


3. Prior to the filing of the Debtor's Petition, Big Two Mile attached certain of the funds of the Debtor on deposit at the City National Bank. The particulars of the attachment of the funds are described in the Disclosure Statement and in the proof of claim filed by Big Two Mile [Claim 21-1]. By a former order of this Court [Doc], the court granted to the Debtor the use of those funds and ordered City National Bank to pay them over to the Debtor. The Plan proposes avoid Big Two Mile's interest in the attached funds. Big Two Mile's claim asserts the ownership of those funds. Big Two Mile objects to the Plan to the extent the Plan seeks to allow

Mile objects to the Plan to the extent the Plan seeks to allow the Debtor to retain possession of the attached funds and to avoid Big Two Mile's interest in them.

4. On information and belief, the Disclosure Statement and Plan do not adequately value the inventory of the Debtor. Big Two Mile has employed an appraiser to view the inventory and to appraise its value. The Disclosure Statement does not adequately describe the extent of the inventory or its proposed valuation of it.

WHEREFORE, Big Two Mile requests this Court to require the Debtor to provide additional information for consideration of Big Two Mile prior to approving the Disclosure Statement and Plan.

**Big Two Mile Gas Company,
By Counsel,**



Thomas H. Vanderford, IV (WV Bar #3845)
Pauley Curry, PLLC
P.O. Box 2786
Charleston, WV 25330-2786
Phone: 304-342-6000
Fax: 304-342-6007

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CERTIFICATE OF SERVICE

I, Thomas H. Vanderford, IV, do hereby certify that service of the foregoing OBJECTION OF THE BIG TWO MILE GAS COMPANY TO THE PROPOSED DISCLOSURE STATEMENT AND CHAPTER 11 PLAN was made upon the following counsel of record, by electronic filing using the Court's CM/ECF system and by placing a copy of the same in the U.S. mail, first-class postage prepaid, on this the 19th day of October, 2011.

Steven L. Thomas
Kay Casto & Chaney PLLC
PO Box 2031
Charleston, WV 25327-2031
Counsel for Blenko Gas Company

Douglas A. Kilmer
Office of the U.S. Trustee
2025 United States Courthouse
300 Virginia Street East
Charleston, WV 25301

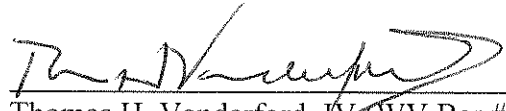
Charles I. Jones
Campbell Woods PLLC
PO Box 2393
Charleston, WV 25328
Chairman, Committee of Unsecured Creditors

J. Patrick Jones
Campbell Woods PLLC
PO Box 1835
Huntington, WV 25719-1835
Committee of Unsecured Creditors

Courtlandt L. Smith
112 Brooks Street
Charleston, WV 25301
Counsel for Union Oil & Gas and Teavee Oil & Gas

Peter N. Pross
April M. Hincy
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219

Mary B. McLaughlin, Senior Counsel
WorkForce West Virginia/Legal Section
112 California Avenue
Charleston, WV 25305
*Counsel for WorkForce West Virginia
Unemployment Compensation Division*


Thomas H. Vanderford, IV (WV Bar #3845)
Pauley Curry, PLLC
P.O. Box 2786
Charleston, WV 25330-2786